



Davis Wright  
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September 1, 2022

*Via Federal Express*  
Brenna B. Mahoney  
Clerk of Court  
U. S. District Court for the Eastern District of New York  
225 Cadman Plaza East  
New York, New York 11201

*RECD. 10/12/2022  
ATTACHMENT*  
**FILED**  
IN CLERK'S OFFICE  
U.S. DISTRICT COURT E.D.N.Y.  
★ SEP 02 2022 ★  
BROOKLYN OFFICE

*Re: Notice of Personally Disqualified Lawyer – Leena Charlton*

Dear Ms. Mahoney:

We represent defendant Quasar Distributors, LLC in two actions pending before Judge Block, *In re Infinity Q Diversified Alpha Fund and Infinity Q Volatility Alpha Fund L.P. Sec. Litig.*, No. 21-cv-01047, and *Oak Fin. Group, Inc. v. Infinity Q Diversified Alpha Fund*, No. 21-cv-03249. We write to advise the Court that Leena Charlton, a former law clerk in Judge Block's chambers, has accepted a position at our law firm, and we have determined that Ms. Charlton is personally disqualified from participating in the representation of Quasar in those actions pursuant to the New York Rules of Professional Conduct. Enclosed please find an affidavit by Ms. Charlton acknowledging her disqualification and setting forth the screening procedures that we have put in place in this regard in accordance with RPC 1.12(d).

A copy of this letter is being sent via electronic mail to Judge Block and all counsel of record in the above-referenced actions.

Respectfully submitted,

*[Signature]*  
James K. Goldfarb

Encl.

cc Hon. Frederic J. Block (via e-mail)  
All Counsel of Record (via e-mail)

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**RPC 1.12(d) AFFIDAVIT OF LEENA CHARLTON**

**Re: Cases before the Hon. J. Frederic Block**

Leena Charlton, on oath, states as follows:

1. This affidavit is made pursuant to Rule 1.12(d) of the New York Rules of Professional Conduct. To provide the notice required by RPC 1.12(d), a copy of this affidavit is being sent to Brenna B. Mahoney, Clerk of Court in the United States District Court (E.D.N.Y.) (the "Tribunal"), for attention to the Chambers of the Hon. J. Frederic Block, and to counsel for the parties in the following two matters: (1) In re Infinity Q Diversified Alpha Fund and Infinity Q Volatility Alpha Fund L.P. Securities Litigation, No. 1:21-cv-01047 (E.D.N.Y.) (the "Class Action Litigation"); and (2) Oak Financial Group, Inc. v. Infinity Q Diversified Alpha Fund et al., No. 1:21-cv-03249 (E.D.N.Y.) (the "Oak Litigation" and, together with the Class Action Litigation, the "Litigations").
2. I will join Davis Wright Tremaine LLP as an associate on Wednesday, August 31, 2022. Prior to joining Davis Wright Tremaine LLP, I worked as a judicial law clerk for the Honorable J. Frederic Block, between August 25, 2021 and August 1, 2022.
3. During my clerkship, the Litigations were before Judge Block. For conflicts purposes, I have been informed that Davis Wright Tremaine LLP represents Quasar Distributors, LLC, a defendant in the Litigations.
4. I am aware that Davis Wright Tremaine LLP has decided to treat me as a personally disqualified lawyer under RPC 1.12(a) with respect to the Litigations, regardless of any actual conflict under RPC 1.12 with either the Class Action Litigation or the Oak Litigation.
5. Thus, pursuant to RPC 1.12(d), I attest that I will not participate in the Litigations and have not previously discussed, and will not discuss, the Litigations or any information related to the Litigations with any lawyer or staff person of Davis Wright Tremaine LLP. I further attest that during the period of my personal disqualification, all lawyers and staff of Davis Wright Tremaine LLP will be apprised that I am screened from participating in or discussing the Litigations or any related matters.
6. The screening procedures to be used are as follows:
  - a. A memorandum shall be sent to all lawyers and staff at Davis Wright Tremaine LLP advising them of the establishment of the ethical screen and the screening procedures to be followed;
  - b. The lead attorneys working on the Litigations will be specifically advised of the existence of the ethical screen;

c. I will not be given access to any Davis Wright Tremaine LLP files concerning the Litigations or any related matters, and I will not discuss the Litigations with any lawyer or staff person of Davis Wright Tremaine LLP;

d. Each of the client files generated in connection with the Litigations and related matters will (i) either: (a) be maintained in a separate file cabinet or room, clearly providing notice that the file is not to be disclosed to me; or (b) each file will have a label affixed stating that it is a confidential client file, and not to be disclosed to me; and (ii) each electronic file will be locked from access by me.

IN WITNESS WHEREOF the undersigned has executed this affidavit as of this  
30 day of August, 2022.

  
Leena Charlton

STATE OF TENNESSEE )  
                        )  
COUNTY OF WILLIAMSON      )

On this 30 day of August, 2022, before me, a Notary Public in and for the State of Tennessee, personally appeared Leena Charlton, personally known to me (or proved to me on the basis of satisfactory evidence) to be the person who executed this instrument and acknowledged it to be her free and voluntary act and deed for the uses and purposes mentioned in the instrument.

IN WITNESS WHEREOF, I have hereunto set my hand and official seal the day and year first above written.



  
NOTARY PUBLIC in and for the State of Tennessee  
residing at County of Williamson  
My appointment expires 3-6-2024  
Print Name Susan Coleman

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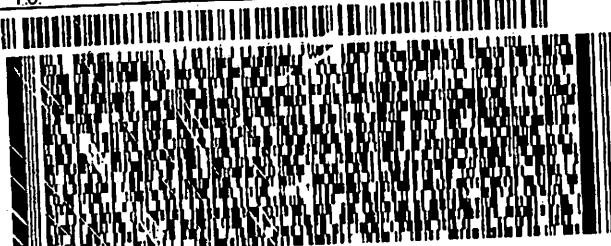
TO BRENNAB. MAHONEY  
CLERK OF THE COURT  
225 CADMAN PLAZA EAST

NEW YORK NY 11201

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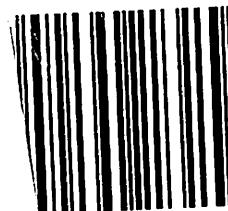
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